

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC. SECURITIES LITIGATION	CASE NO. 4:19-CV-00957 (CONSOLIDATED) JUDGE GEORGE C. HANKS, JR. THIS DOCUMENT RELATES TO: CASE NO. 4:22-CV-01189 CASE NO. 4:22-CV-02590
--	---

**JOINT STIPULATION REGARDING BRIEFING SCHEDULE
ON MOTIONS TO DISMISS ALYESKA AND ORBIS ACTIONS**

WHEREAS, on April 13, 2022, Plaintiffs Alyeska Master Fund, L.P., Alyeska Master Fund 2, L.P., and Alyeska Master Fund 3, L.P. (collectively, “Alyeska Plaintiffs”) filed a complaint (the “Alyeska Complaint”) against Alta Mesa Resources, Inc., f/k/a Silver Run Acquisition Corporation II, Riverstone Holdings LLC, ARM Energy Holdings LLC, Bayou City Energy Management, LLC, HPS Investment Partners, LLC, James T. Hackett, Harlan H. Chappelle, William Gutermuth, Jeffrey H. Tepper, Diana J. Walters, Michael E. Ellis, Ronald Smith, Don Dimitrievich, Pierre F. Lapeyre, Jr., David M. Leuschen, William W. McMullen, Donald Sinclair, Stephen Coats, and Thomas J. Walker (collectively “Defendants”).

WHEREAS, on August 3, 2022, Plaintiffs Orbis Global Equity LE Fund (Australia Registered), Orbis Global Equity Fund (Australia Registered), Orbis Global Balanced Fund (Australia Registered), Orbis SICAV, Orbis Institutional Global Equity L.P., Orbis Global Equity Fund Limited, Orbis Institutional Funds Limited, Allan Gray Australia Balanced Fund, Orbis OEIC, and Orbis Institutional U.S. Equity L.P. (collectively, “Orbis Plaintiffs”) filed a complaint (the “Orbis Complaint”) against Defendants.

WHEREAS, pursuant to the Joint Scheduling Stipulation (ECF No. 261), on January 10, 2023, Defendants filed four separate dismissal motions against the Alyeska and Orbis Complaints (the “Motions to Dismiss”).

WHEREAS, the Alyeska and Orbis Plaintiffs’ opposition to the Motions to Dismiss were originally due on January 31, 2023, but that date was extended via Stipulation (ECF No. 272) until February 14, 2023.

WHEREAS, Defendants have agreed to extend the time by an additional 3 days for the Alyeska and Orbis Plaintiffs oppose the Motions to Dismiss.

WHEREAS, this additional short extension to the briefing schedule will not delay the Consolidated Action, because (i) the extension does not alter the date on which the Motions to Dismiss will be fully briefed, and (ii) the Alyeska and Orbis Plaintiffs are attending and fully participating in the depositions that are currently being conducted.

WHEREAS, the Parties have also conferred on their availability for oral argument on the Motions to Dismiss.

IT IS HEREBY STIPULATED AND AGREED, by and between the Parties:

1. The Alyeska and Orbis Plaintiffs shall file any opposition to the Motions to Dismiss on or before February 17, 2023;
2. Defendants shall file any replies in support of the Motions to Dismiss on or before March 14, 2023 (*i.e.*, the previously agreed-upon deadline for those replies).
3. The Parties jointly respectfully request that the Court hold oral argument on the Motions to Dismiss on March 30, 2023 (or any day the week of March 27, 2023), or at the Court’s earliest convenience.

Dated: February 9, 2023

/s/ J. Christian Word

J. Christian Word
Attorney-in-Charge
D.C. Bar No. 461346
S.D. Tex. Bar No. 3398485
LATHAM & WATKINS LLP
555 Eleventh Street, NW
Suite 1000
Washington DC 2004
Tel.: (202) 637-2200
Fax: (202) 637-2201
Christian.Word@lw.com

*Counsel for Defendants Alta Mesa Resources, Inc.,
f/k/a Silver Run Acquisition Corporation II;
Riverstone Holdings LLC; James T. Hackett,
Harlan H. Chappelle, William Gutermuth, Jeffrey
H. Tepper, Diana J. Walters; Michael E. Ellis;
Ronald Smith; Pierre F. Lapeyre, Jr.; David M.
Leuschen; Donald Sinclair; Stephen Coats; and
Thomas J. Walker*

Walter M. Berger
TX Bar No. 00798063
Attorney-in-Charge
Katherine A. Preston
TX Bar No. 24088255
WINSTON & STRAWN LLP
800 Capitol Street, Suite 2400
Houston, TX 77002-2925
Tel.: (713) 615-2699
Fax: (713) 651-2700
cberger@winston.com
kpreston@winston.com

Of Counsel:
John E. Schreiber (pro hac vice)
CA Bar No. 261558
Aaron C. O'Dell (pro hac vice)
CA Bar No. 281851
WINSTON & STRAWN LLP
333 S. Grand Ave., 38th Floor
Los Angeles, CA 90071
Tel.: (213) 615-1700
Fax: (213) 615-1750

jschreiber@winston.com
acodell@winston.com

*Co-Counsel for Harlan H. Chappelle,
Michael E. Ellis*

/s/ Kenneth A. Young

Kenneth A. Young
Attorney-in-Charge
Texas Bar No. 25088699
S.D. Tex. No. 2506614

KIRKLAND & ELLIS LLP
KIRKLAND & ELLIS INTERNATIONAL LLP
609 Main Street
Houston, Texas 77002
Tel.: (713) 836-3600
Fax: (713) 836-3601
kenneth.young@kirkland.com

*Counsel for Bayou City Energy Management, LLC
and William W. McMullen*

/s/ Karl S. Stern

Karl S. Stern
Attorney-in-Charge
Texas Bar No. 19175665
Federal Bar No. 04870
**QUINN, EMANUEL, URQUHART &
SULLIVAN, LLP**
711 Louisiana Street, Suite 500
Houston, Texas 77002
Tel.: (713) 221-7000
Fax: (713) 221-7100
karlstern@quinnmanuel.com

*Counsel for HPS Investment Partners, LLC and
Don Dimitrievich*

/s/ Bruce M. Bettigole

Bruce M. Bettigole (*pro hac vice forthcoming*)
Attorney-in-Charge
EVERSHEDS SUTHERLAND LLP
700 6th Street NW
Suite 700
Washington, D.C. 20001
Tel.: (202) 383-0100

Fax: (713) 221-7100
brucebettigole@eversheds-sutherland.com

Counsel for ARM Energy Holdings LLC

/s/ Matthew A. Peller
Matthew A. Peller
ROLNICK KRAMER SADIGHI LLP
1251 Avenue of the Americas
New York, NY 10020
Tel.: (212) 597-2800
mpeller@rksllp.com

Attorney in Charge for the Alyeska and Orbis Plaintiffs

Jules P. Slim
TX Bar No. 00793026
Attorney and Counselor
PO Box 140307
Irving, TX 75014-0307
Tel.: (214) 350-5183
Fax: (214) 350-5184
jslim@slimlawfirm.com

Counsel for the Alyeska and Orbis Plaintiffs

SO ORDERED:

Judge George C. Hanks, Jr.
United States District Judge